



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 29, 2020

BY ECF

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Mircea Constantinescu, et al.*, 19 Cr. 651 (LTS)

Dear Judge Swain:

The Government respectfully submits this letter to request, with the consent of the defendants, that, in light of the advice given by the Centers for Disease Control and Prevention and other public health authorities to take precautions to reduce the possibility of exposure to COVID-19, and in order to provide the defendants with additional time to review the discovery materials produced in this case and discuss potential pretrial dispositions with the Government, the Court adjourn the status conference presently scheduled for June 8, 2020, at 2:00 p.m., to a date and time convenient to the Court on or after July 6, 2020.

The Government also respectfully requests, with the consent of the defendants, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from June 8, 2020, until the date of the rescheduled status conference, in light of the circumstances of the COVID-19 pandemic, and in order to provide the defendants with additional time to review the discovery materials produced in this case and discuss potential pretrial dispositions with the Government.

The application is granted. The conference is adjourned to July 15, 2020, at 2:30pm. The Court finds pursuant to 18 U.S.C. §3161(h)(7) (A) that the ends of justice served by an exclusion of the time from today's date through July 15, 2020, outweigh the best interests of the public and the defendant(s) in a speedy trial for the reasons stated above.

SO ORDERED.

Dated: May 29, 2020

/s/ Laura Taylor Swain
Laura Taylor Swain, USDJ

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: Robert B. Sobelman
Elizabeth A. Hanft
Daniel M. Loss
Samuel P. Rothschild
Robert B. Sobelman
Assistant United States Attorneys
(212) 637-2334/6527/2504/2616

cc: All Counsel of Record (by ECF)